



THE CITY OF LYNCHBURG, VIRGINIA

525 Taylor Street, Lynchburg, VA 24501  
www.lynchburgva.gov  
TEL: 434-847-1322  
FAX: 434-845-7353

UTILITIES DIVISION

December 21, 2004

**RECEIVED**

DEC 21 2004

**DEQ SCRO**

Mr. Tom Henderson, Regional Director  
South Central Regional Office  
Department of Environmental Quality  
7705 Timberlake Road  
Lynchburg, VA 24502

Re: Consent Special Order  
FY 04 CSO Plan Implementation Progress Report

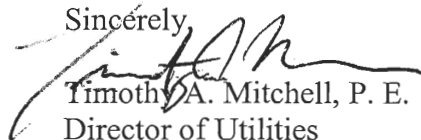
Dear Mr. Henderson:

The City of Lynchburg submits the following information that will complete the City's FY04 Annual Report submission. The complete financial report is enclosed.

P J Sunn LLC, the City's independent rate consultant, has completed their review of the City's compliance with the financial capability criteria contained in Appendix A of the Order. Their report also shows sums obligated for CSO control implementation as required by paragraph 2 of Appendix A of the Order. Since 1993, \$103,464,367 has been appropriated for CSO control projects, with \$89,704,005 in actual expenditures. The Special Order required the City to increase sewer rates so that the annual sewer bill for a residential customer equals or exceeds 1.25% of median household income (MHI). As of July 1, 2004, the annual sewer bill for a residential customer using 7 hcf was equal to 1.16 % of MHI. In previous years this calculation was based on 9 hcf. Please note that the MHI is estimated in accordance with the procedures stipulated in the Special Order and as documented in Schedule 2 of the attached P J Sunn LLC Report. These procedures result in a MHI estimate of \$35,369 as of July 1, 2004. Also note that due to the 2003 refinancing scheme of existing VRLF debt, we will not reach the 1.25% figure. However, the City has implemented the phase-in plan to once again reach 1.25% in five years as stipulated in that agreement.

Please contact me or Greg Poff if you have any questions,

Sincerely,



Timothy A. Mitchell, P. E.  
Director of Utilities

Copies w/ enclosure:

Robert G. Burnley, Director, DEQ; L. Kimball Payne, III, City Manager  
Bruce McNabb, Director of Public Works; Mike Hill, Director of Financial Services;  
Gregory L. Poff, CSO Program Manager

*PJ Sun LLC  
405 Druid Hill Road  
Vienna, Virginia 22180*

December 16, 2004

Mr. Tim Mitchell  
Utilities Director  
City of Lynchburg  
535 Taylor Street  
Lynchburg, Virginia 24501

Dear Mr. Mitchell:

At your request we reviewed the attached schedules that we understand will be included in the City's annual CSO compliance report to the Department of Environmental Quality (DEQ) for the year ended June 30, 2004:

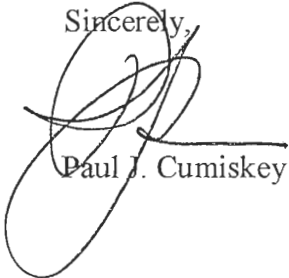
1. Schedule of sewer rates and charges for each of the five years ended June 30, 2004.
2. Calculation of the annual sewer bill as a % of MHI as of June 30, 2004.
3. Schedule of debt coverage for each of the five years ended June 30, 2004.
4. Schedule of unrestricted / unreserved cash balance as a % of the FY 2005 operating fund budget appropriation as of June 30, 2004.
5. Summary schedule of CSO and other water quality project expenditures.

We performed the following procedures in order to verify the amounts shown on the attached schedules and calculation:

- Tested the mathematical accuracy of all of the schedules and calculations.
- Compared the rates and charges included in Schedule 1 to approved City Council ordinances authorizing the rates and charges.
- Compared the MHI amount in 2000 as shown in Schedule 2 to information published by the U.S. Census Bureau.
- Compared the increase in the AGI and CPI shown in Schedule 2 to information published by the Cooper Weldon Center and the U.S. Department of Labor and Statistics.
- Compared the amounts included in Schedules 3 and 4 to the City's audited annual financial statements for the year ended June 30, 2004.
- Compared the amount of the FY 2005 sewer operating fund budget appropriation shown on Schedule 4 to the City's published budget.
- Compared FY 2004 expenditures shown on Schedule 5 to supporting schedules and to the City's general ledger account balances in the sewer capital and VRLF funds.

No exceptions were noted and we therefore conclude that the amounts reported are mathematically accurate and based on information published by independent third parties and / or audited financial statement data.

Sincerely,

A handwritten signature in black ink, appearing to be "Paul J. Cumiskey", written over the printed name. The signature is stylized with a large loop at the beginning and a horizontal line extending to the right.

Paul J. Cumiskey

SCHEDULE 1  
SEWER RATES AND CHARGES

Volume rate	7/1/00	7/1/01	7/1/02	7/1/03	7/1/04
	\$3.56	\$3.70	4.07	\$4.42	\$4.60
Meter charge / customer / month	1.85	1.85	1.85	1.85	1.85
BOD charge / 100 lbs.	14.93	15.52	15.52	16.64	16.78
TSS charge / 100 lbs.	17.55	18.25	18.25	18.25	18.98
Residential septic hauler charge	170.00	177.00	177.00	177.00	177.00
Avg. annual Industrial permit charge	200.00	200.00	200.00	200.00	200.00
Avg. annual Industrial monitoring charge	925.00	925.00	925.00	925.00	925.00
Sewer connection charge	450.00	450.00	700.00	770.00	847.00
Sewer availability fee	1,950.00	1,950.00	1,950.00	1,950.00	1,950.00

## SCHEDULE 2

### CALCULATION OF THE ANNUAL SEWER BILL AS A % OF MHI

#### ANNUAL SEWER BILL:

Effective rate @ 7 hcf	7/1/2004
Average monthly use in hcf	<u>\$4.60</u>
Volume charge	7
Meter charge	32.20
Total monthly sewer bill	1.85
	<u>34.05</u>
	x12
Annual sewer bill	<u><u>\$408.60</u></u>

#### MHI CALCULATION:

2000 MHI reported by the U.S. Census Bureau (1999 data)	\$32,234
Increase in AGI from 1999 to 2001	<u>3.99%</u>
Est. MHI @ December 2001 ( $\$32,234 \times 1.0399$ )	<u>\$33,519</u>
Estimate increase in CPI from December 2001 to June 2004 ( $(189.7 - 176.7) / 176.7 \times .75$ )	<u>5.52%</u>
Est. MHI @ July 2004 ( $\$33,519 \times 1.0552$ )	<u><u>\$35,369</u></u>

#### ANNUAL SEWER BILL AS A % Estimated MHI

(\$408.60/\$35,369)	1.16%
---------------------	-------

SCHEDULE 3  
DEBT COVERAGE

	FY 2000	FY 2001	FY 2002	FY 2003	FY 2004
<b>REVENUES:</b>					
Sewer charges	\$10,052,326	\$10,147,441	\$10,498,160	\$11,845,635	\$12,629,154
Sewer contracts	3,084,252	2,574,809	3,060,055	2,206,274	1,766,288
Interest and other	146,904	196,248	227,971	241,847	139,070
	<u>13,283,482</u>	<u>12,918,498</u>	<u>13,786,186</u>	<u>14,293,756</u>	<u>14,534,512</u>
<b>O&amp;M EXPENSES:</b>					
Sewer line maintenance	873,106	944,914	809,523	1,185,414	1,326,711
Waste water treatment	3,323,554	2,965,207	2,923,915	3,875,488	3,704,351
Payments to Water Fund	343,724	343,724	460,000	460,000	500,000
General Fund overhead	953,935	953,935	810,845	158,759	347,841
Project costs charged to operations	-	-	23,657	53,233	26,427
All other	319,164	381,990	255,658	0	703,268
	<u>5,813,483</u>	<u>5,589,770</u>	<u>5,283,598</u>	<u>5,732,894</u>	<u>6,608,598</u>
<b>NET REVENUES</b>	<u>\$7,469,999</u>	<u>\$7,328,728</u>	<u>\$8,502,588</u>	<u>\$8,560,862</u>	<u>\$7,925,914</u>
<b>DEBT SERVICE</b>	<u>\$5,132,839</u>	<u>\$6,016,177</u>	<u>\$6,458,655</u>	<u>\$7,040,471</u>	<u>\$5,959,229</u>
<b>DEBT COVERAGE</b>	<u>1.46</u>	<u>1.22</u>	<u>1.32</u>	<u>1.22</u>	<u>1.33</u>

Note:

1. All other in FY 2004 includes the costs to clean the James River Interceptor.

SCHEDULE 4

UNRESTRICTED/UNRESERVED CASH BALANCE AS A PERCENTAGE OF FY 2005 SEWER OPERATING FUND APPROPRIATION

Total Sewer Fund Cash & Investments	\$ 6,508,156
Less amounts restricted & reserved for:	
--unexpended bond funds that are reserved for sewer capital projects	(1,663,754)
--cash balances earmarked for sewer capital projects	<u>(2,575,480)</u>
Unrestricted/unreserved cash & investments at June 30, 2004	<u>\$ 2,268,922</u>
FY2005 Sewer Operating Fund Budget Appropriation	<u>\$ 13,182,156</u>
Unrestricted/unreserved cash & investments at June 30, 2004 as a % of FY 2005 Sewer Operating Fund Appropriation	<u>17.21%</u>

SCHEDULE 5  
SUMMARY OF CSO AND OTHER WATER QUALITY PROJECTS EXPENDITURES

	CSO	Water Quality	Total
FY 1994 expenditures	\$ 1,189,163	\$ 3,717,999	\$ 4,907,162
FY 1995 expenditures	3,741,404	2,281,684	6,023,088
FY 1996 expenditures	4,848,024	5,273,630	10,121,654
FY 1997 expenditures	13,785,402	4,956,604	18,742,006
FY 1998 expenditures	12,891,319	10,040,200	22,931,519
FY 1999 expenditures	7,487,039	8,515,561	16,002,600
FY 2000 expenditures	12,090,153	2,681,055	14,771,208
FY 2001 expenditures	10,683,348	2,064,347	12,747,695
FY 2002 expenditures	9,635,917	3,240,617	12,876,534
FY 2003 expenditures	5,228,115	586,812	5,814,927
FY 2004 expenditures	8,124,121	823,214	8,947,335
Unexpended authorization	10,545,362	685,168	11,230,530
Appropriations to be authorized	3,215,000	925,000	4,140,000
Totals	\$ 103,464,367	\$ 45,791,891	\$ 149,256,258

Note:

Appropriations to be authorized represent approved CIP amounts that have not been authorized for specific projects at June 30, 2004.





## THE CITY OF LYNCHBURG, VIRGINIA

525 Taylor Street, Lynchburg, VA 24501  
www.lynchburgva.gov  
TEL: 434-455-4250  
FAX: 434-845-7353

UTILITIES DIVISION

December 1, 2004

Mr. Tom Henderson, Regional Director  
South Central Regional Office  
Department of Environmental Quality  
7705 Timberlake Road  
Lynchburg, VA 24502

Re: Consent Special Order  
FY 04 CSO Plan Implementation Progress Report

**RECEIVED**

DEC 01 2004

**DEQ SCRO**

Dear Mr. Henderson:

The City of Lynchburg submits the following CSO Program Annual Report for FY 04 as required by Appendix A to the captioned Order. Specific detail is provided in the following sections:

### **Section 1: Consultant's Financial Compliance Report**

The Financial Compliance Report will be submitted under separate cover letter by January 1, 2005. The City has been delayed in closing its financial records for FY04 for various reasons beyond this Department's control.

### **Section 2: CSO Project Status**

This section list the status of CSO control projects for which funds have been obligated as required by paragraph 2 of Appendix A of the Order. Phase 1 of the Citywide Rainleader Disconnect project has been completed. Phase 2 was implemented in September 2000. Construction of all major combined Interceptor sewers, except for the James River Interceptor, has been completed. To date, 29 separation construction projects have been completed, are under design or construction. Of the original 132 overflow points, 96 have been eliminated, leaving 36 overflow points to be closed in the future. The City's sewer model was not updated in 2004.

#### **A. Rainleader Disconnection Program**

The Rainleader Disconnection Program (RDP) is a four-phase program designed to enlist citizen participation in the solution to Lynchburg's Combined Sewer Overflow (CSO) problem. City Council formally adopted policies and guidelines for the Program on May 14, 1996. During the report period, an additional 92,616 square feet of

impervious area was disconnected which equates to a total of 8,407,672 square feet removed or 59% of the initial 14,255,862 total square feet of connected area.

**B. Interceptor Replacement Program (Status through November 1, 2004 and ranking per CSO Study Update 2000 Report)**

<u>Priority Ranking</u>	<u>Status</u>	<u>Project</u>
1	Construction Complete	Blackwater 1 & 2
2	Construction Complete	Fishing Crk - Phase I - Div. 1
3	Construction Complete	Blackwater 3 & 4
4	Construction Complete	Blackwater 5
5	Construction Complete	Fishing Crk - Phase I - Div. 2
6	Construction Complete	Blackwater 8A
7	Construction Complete	Fishing Crk - Phase I - Div. 3
8	Construction Complete	Fishing Crk - Phase I - Div. 4
9	Construction Complete	Blackwater 8B
10	Construction Complete	Ivy Creek 1A
11	Construction Complete	Ivy Creek 1B
12	Construction Complete	Ivy Creek 2
13	Construction Complete	Blackwater 7
14	Construction Complete	Ivy Creek 3
15	Construction Complete	Blackwater 6
16	Construction Complete	Fishing Crk - Phase I - Div. 5
17	Redesign 100% Complete	James River Div. 1
18	Redesign 100% Complete	James River Div. 2
19	Design 100% Complete	Blackwater Creek Outfall- Meeting House Branch
20	Design 16% Complete	James River Div. 3 (design halted)
21	Under contract for PER	James River Div. 4, 5, 6
22	Design 100% Complete	Blackwater Creek Outfall – Monroe & 1 <sup>st</sup> Street
23	Construction Complete	Pigeon Creek Phase II 2A
	Construction 80% Complete	Pigeon Creek Phase II 2B
24		Fishing Creek Phase II- Kemper Street
25		Fishing Creek Phase III- Mayflower Dr.
26		Blackwater Creek Outfall- Randolph & Savoy Pl.

27		Blackwater Creek Outfall- Belfield Pl
28	Partial project under contract	Blackwater Creek Outfall- Jefferson Park (Hillcrest Ave)
29		Blackwater Creek Outfall- College Lake

**C. Separation/Rehabilitation Program (Status through November 1, 2004 and ranking per CSO Study Update 2000 Report)**

<u>Priority Rank</u>	<u>Project</u>	<u>Priority Rank</u>	<u>Project</u>
	(Pilot) 1-C (A) (completed)	31	1-D-3.2
	(Pilot) 1-A-4(A) (completed)	32	1-A-5.2
1	(Pilot) 7.2 (completed)	33	1-A-5.1
2	(Pilot) 6.4 (completed)	34	16.3
3	11.1A - (completed)	35	1-D.3
	11.1B - (completed)	36	17.1
4	14.3 - (completed)	37	16.1
5	14.2 - (completed)	38	16.5
6	18.3 - (completed)	39	S-1-A-1
7	7.3- (completed)	40	17.4
8	7.1 - (completed)	41	17.3
9	6.3 - (completed)	42	1-D-5.1
10	6.2 - (completed)	43	5.4
11	6.1 - (completed)	44	5.3
12	11.3- (completed)	45	5.2
13	5.4 A- Kemper St. - (completed)	46	5.1
14	S-1-A-2 (Upper 9 <sup>th</sup> St) - (completed)	47	S-1-A-4
15	Cross Town Connector-(on hold)	48	1-C
16	11.2 - (completed)	49	S-1-A-3
17	17.2- (completed)	50	16.7
18	3.1 - (completed)	51	2.1
19	1-D-3.3 - Construction (completed)	52	1-B-2.1
20	12.5- Construction 90%	53	7.4
21	12.4-Construction 50%	54	14.1
22	12.3- Construction 10% Complete	55	1-B-1.1
23	12.2 - Under Bid	56	1-D-6.1
24	12.1- Design 100% Complete	57	1-D-2

25	18.2 - Design 100% Complete	58	1-D-1
26	8.1 (A,B,C)- Design 40% complete on "B"	59	1-B-5.1
27	1-D-3.1		
28	1-D.4		
29	1-B-4.1		
30	2.2		

NOTE: The following five-permitted CSO points were closed in the last year (60; 74;78;87;113).

#### **D. Adjustments of CSO Implementation Priorities**

In the 2000 Update Study, the City requested a change to the priority projects listing to accommodate three important City projects, all located within the combined sewer area of the City. The remaining project, the Cross-town Connector Sewer, has not been scheduled due to the continued delay of the associated VDOT project.

#### **E. James River Interceptor**

The replacement of the James River Interceptor (JRI) continues to be delayed. Plans for the redesign of Divisions 1 & 2 to meet CSX Railway conditions have been completed and are under City review. An engineering contract for replacement options for Divisions 4, 5, & 6 on the Upper JRI has been signed. In FY 04, the entire JRI was cleaned. Critical spots will be cleaned on a yearly basis to maintain maximum flow capacity to the treatment plant.

### **Section 3: Proposed Sewer Fund Appropriations for FY 05**

Paragraph 3 of Appendix A of the Order requires the City to show the proposed implementation and schedule of CSO control projects to begin in the next fiscal year. The total amount to be appropriated for FY 05 CSO projects is \$8,000,000. The City continues to be active in pursuing grant funding at the federal and state level. The City continues to work with the Virginia Revolving Loan Fund to obtain low interest and no interest loans for CSO and water quality projects. In FY 00, Congress authorized \$30 million of grant funds through the Water Resources Development Act (WRDA) for Lynchburg's CSO Control Program. The City continues to seek appropriations from this authorization. In FY04, the City signed an agreement with EPA for a matching grant of \$1,253,800 from previous year authorizations. Since FY 98, Congress and the State General Assembly have appropriated \$32.9 million dollars to CSO projects. The following funds have been **appropriated** in the current FY 05 Sewer Capital Projects Plan:

**A. CSO Projects:**

1) Separation Projects	\$7,900,000
2) Rainleader Disconnect Program	100,000

Sub-total: \$8,000,000

**B. Water Quality Projects**

1) Major Collection System Repairs	\$500,000
2) Sewer Extensions	350,000
3) WWTP Improvements	500,000

Sub-total: \$1,350,000

**Total: \$9,350,000**

**Section 4: Status of the "Nine Minimum Controls"**

As required in Part 1, Section E, subsection 1, of the City's VPDES Permit, the City of Lynchburg is to report the yearly progress of its "Nine Minimum Controls" implementation. The following summarizes each of the "Controls" for FY 04.

**A. Operation and Maintenance**

- (1) The City Utility sewer maintenance crews routinely clean and inspect sewers in the combined area. Over 153,204 linear feet of sewers were inspected through out the City system in the last year. The City currently operates two TV units. Over 212,396 linear feet of sewers were cleaned. The Utilities Department has purchased a combination cleaning and television unit which will allow both cleaning and televising of sewer lines at the same time. This will provide for a more efficient and therefore more line footage investigated capability to the collection system maintenance effort.
- (2) A maintenance crew is assigned to inspect all open CSO control points and structures on at least a monthly basis. A standard form is completed for each control point, indicating current status of the control structure. Depending on extent of needed repair or cleaning, the crew members perform the repairs or request additional assistance.
- (3) The City has two sewage pumping stations in its system. They are located at Rock-Tenn and the wastewater treatment plant. The Rock-Tenn station is checked once per shift or when alarmed. The treatment plant station is visually monitored every

two hours and it is tied into the plant SCADA system. The treatment plant screens are automated and provide continuous cleaning.

- (4) Hydraulically clean sewers as needed. Refer to item (1) above. Currently, the City has two Vac-tor jet trucks used for cleaning sewers.

**B. Use Collection System for Storage**

- (1) Construction of major interceptor sewers is following the CSO Project Priority Listing contained in this report.
- (2) Rehabilitation or replacement of sanitary sewers is following the CSO Project Priority Listing contained in this report. The City is replacing or rehabilitating up to 90% of its sanitary sewer system in the combined areas. The original 1989 CSO Study only called for 20% replacement.
- (3) The standard operating procedure for the treatment plant has been revised to include procedures for increasing the influent rate into the plant during wet weather periods. The main goal for this procedure is not to overload the secondary clarifiers.

**C. Pretreatment Program**

- (1) Section 34-66 of the City Code details the City's pretreatment ordinance. It specifically lists the City's enforcement authority over user discharge strength and constituency. The City's Pretreatment Program was adopted in 1985. There are twenty-two permitted customers. With the continued replacement of the City's major interceptors along the heavily industrialized areas of the City, frequency of overflows and subsequent discharges containing industrial waste, have been greatly reduced in the upper reaches of the tributaries of the James River. With the proposed replacement of the James River Interceptor and continued separation of the system, the frequency of overflow will continue to diminish.
- (2) College Hill Water Treatment plant operators have been advised not to discharge filter backwash water under wet weather conditions.
- (3) Utilize the Pretreatment Program to limit industrial discharges during wet weather. A specific study of this issue has not been made. However, as stated in C. (1) above, with greater capacities in the interceptor sewers, the frequency of discharge from the Combined Sewer System has been greatly reduced.

**D. Maximize Flow to Wastewater Treatment Plant**

- (1) Construction of major interceptor sewers is following the CSO Project Priority Listing contained in this report. The replacement of the JRI has been delayed as noted previously.
- (2) The standard operating procedure for the treatment plant has been revised to include procedures for increasing the influent rate into the plant during wet weather periods.
- (3) Major cleaning of the James River Interceptor has taken place with critical spots to be cleaned on a yearly basis.

**E. Eliminate Dry Weather Overflows**

- (1) The City has in place a Technical Review Process by which all new construction and site plans within the City limits are reviewed by appropriate staff and departments. The staffs responsible for review of proposed utilities are aware of the restriction of construction of no new combined sewers. Any potentially large industrial or commercial sewer customers are required to submit sewer flow need calculations to the staff for review. The City maintains sewer system capacity reports as a reference.
- (2) Routinely inspect diversion weirs at discharge points. Refer to A. (2) above.
- (3) Monitor pumping stations for Dry Weather Overflows (DWO). Refer to A. (3) above.
- (4) Key division personnel are assigned to "on-call duty" 24 hours/day, 7 days/week, to address sewer related issues.
- (5) A Utilities staff engineer is accountable for the reporting and investigation of all DWO discharges. Copies of the notifications are kept on record. A first, verbal notification takes place within 24 hours and a follow-up, written response, within five days.
- (6) As mentioned in B. (2) above, intensive televising of sewers within each project area has lead to the replacement of a greater footage of sewers than that originally programmed.
- (7) Increase capacities in interceptor sewers. Refer to D. (1) above.

**F. Control Solids and Floatable Materials in CSO's**

- (1) The City has a Street Sweeping Program that includes the use of three sweepers and one flusher truck. The program divides the city into twenty sections (ten of which are CSO related), the expressway and the downtown area, and includes over 572 curb miles. The program was restructured in 1997 to meet the needs of the Combined Sewer Overflow Program. The Downtown section is swept weekly. The other sections are swept twice a year and the expressway four times a year. Last year, approximately 589 tons of debris was removed from the city and combined area streets.
- (2) The city removes leaves from city streets, gutters, and ditches during its leaf collection program that begins in mid-October and continues city wide through the end of December. Leaf collection in all four wards of the city is completed by the use of ten mechanical vacuum machines pulled by dump trucks; four drum vacuum trucks, two rear loading compactor trucks and other equipment to collect both bagged and loose leaves. Personnel from all divisions of Public Works are used in a coordinated effort to complete the task of collection and disposal. 2,365 tons of leaves were collected in FY04.

- (3) Last year the City's Utility Division cleaned 5,560-drop inlets and repaired 294 throughout the City.
- (4) The City has an on-going Adopt-A-Street program as well as an Adopt-A-Spot program that groups and individual citizens can sign up to participate in. The groups and individuals can sign up for locations that they would like to maintain and keep clean or they will be assigned a location. In these programs, the City provides orange bags, safety vests, litter grabbers, and will pick up the bags of trash and litter. In addition, the City partners with the Citizens for a Clean Lynchburg (CCL) - a non-profit group which provides education and resources to schools and neighborhood groups for preventing litter as well as picking it up on a routine basis. Finally, various Public Works Divisions (Streets, Buildings and Grounds and Waste Management) perform periodic litter collection in the areas that they work in.

**G. Pollution Control**

- (1) The Waste Management Division conducts tours for neighborhood groups, volunteer groups, and city schools as well as interested citizens. During the past five years, the facility has averaged between 20 and 25 tours a year. The Waste Management Division also partners with the City Schools to provide information regarding proper waste management techniques, waste reduction and reuse and recycling efforts. In addition, the Waste Management Division operates a household hazardous waste program (HHW) four times per year (April, June, August and October). The HHW program allows residents to dispose of these types of waste at no charge by bringing their household hazardous waste materials to the landfill for proper disposal.
- (2) The City also collects brush and bulky household items throughout the year. Residents are asked to call and schedule a collection in advance. This service is designed to be customer friendly and to reduce the possibility of littering and illegally dumping of household items.
- (3) As mentioned in item number f. (4), the City has an active on-going Adopt-A-Street program. Currently there are approximately 65 groups that have adopted a street or location in the City of Lynchburg. As part of their commitment, they are required to collect litter and trash along their designated street(s) at least four times yearly. Other groups also volunteer to perform clean-ups at times during the year.
- (4) The City has a recycling program that encourages industrial, commercial and residential recycling of materials. City representatives routinely speak to various industries about methods to reduce, reuse and recycle materials. There are nine designated drop-off recycling sites located throughout the City that allows residents and small businesses to recycling the following materials: mixed paper, newspaper, magazines, aluminum and steel cans, plastics and glass materials.
- (5) The City operates a septage receiving station at the wastewater treatment plant.



- (6) Section 34-11 of the City Code specifically details an ordinance against discharging any material into the sewer system, which may obstruct or impair flow through the system.

#### **H. Public Notification**

- (1) Signs have been posted at the required locations and are checked periodically.
- (2) The City held a public meeting to invite public comment on its program and for its updated Environmental Assessment for CSO Program Projects on April 24, 2000.
- (3) The City's current policy is to hold a pre-design and post-bid public meeting for each of the individual CSO Separation projects. Public meetings are also held for the Rainleader Disconnect Project whenever a non-Separation construction area is involved. Public meetings have not been held for the interceptor projects. Monthly newsletters, containing the previous month's accomplishments and preceding months anticipated work activities are distributed to the affected homeowners each month for all types of CSO construction projects.
- (4) The City anticipates spending thousands of dollars each year for media announcements that concern the CSO program. TV ads, infomercials, printed material and short videotape presentations aired on the public television station are used to inform the public about the City's CSO Program. The City has on contract a professional advertising firm to handle its CSO media campaign.
- (5) The City has completed Phase 1 of the RDP and implemented Phase 2 in September 2000.
- (6) The City continues to provide funding for the CSO Citizens Hotline. One- full time and one- part time persons staff it. On average it receives over 200 calls per month on CSO issues ranging from project schedules, complaints and general program information.

#### **I. Monitoring**

- (1) Biosurvey and Fecal Coliform Monitoring results from 2004 have been recently submitted to your office as part of the monthly DMR process.
- (2) The Utilities Division maintains five rainfall gages dispersed throughout the combined area. The data collected by the gages is used as input to produce the DMR and subsequent volume and loading calculations for CSO overflows.
- (3) The monthly Discharge Monitoring Report (DMR) of the estimated overflow volume for each open CSO, based on actual rainfall events, is updated to reflect CSO closures as they occur. The City continues to staff its CSO Program Office, dedicated to the management of the CSO Program.

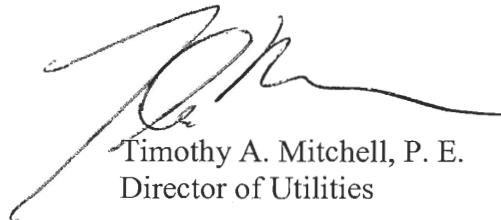
As part of this report, we have enclosed three copies of the overall CSO Program Separation Projects progress map, along with the updated "open" points list.

Mr. Tom Henderson  
December 1, 2004  
Page 10

In closing, the City typically conducts annual bond financing for its capital improvements program in the late January or February timeframe. In conjunction with the bond rating presentations, questions are usually presented regarding the City's compliance with the Special Order. Accordingly, it would be very helpful if the City could receive written confirmation acknowledging compliance with the Special Order by mid-January 2005.

Please call if you have any questions regarding the report or the City's CSO Control Plan implementation efforts.

Sincerely,

A handwritten signature in black ink, appearing to read 'Timothy A. Mitchell', is written over the typed name and title.

Timothy A. Mitchell, P. E.  
Director of Utilities

Enclosures

pc

w/o enclosures:

Robert G. Burnley, Director, DEQ  
L. Kimball Payne, III, City Manager  
Bruce McNabb, Director of Public Works  
Mike Hill, Director of Financial Services  
Gregory L. Poff, CSO Program Manager